

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

KENDALL RAYE ROGERS,)	
)	
Plaintiff,)	
)	
v.)	C. A. No. 05-721-KAJ
)	
STATE OF DELAWARE,)	
DEPARTMENT OF PUBLIC SAFETY/)	
DMV,)	
)	
Defendants,)	

**DEFENDANTS' INITIAL DISCLOSURES
PURSUANT TO FED. R. CIV. P. 26(a)**

Pursuant to Fed. R. Civ. P. 26(a), Defendants State of Delaware, Department of Transportation/DMV** make the following initial disclosures:

1. The name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information.

RESPONSE:

Michael O. McCann
Chief of Administration
Division of Motor Vehicles
Delaware Department of Transportation
PO Box 698
Dover, DE 19903
(302) 744-2546

**At the time of the actions from which the complaint stems, The Division of Motor Vehicles (DMV) was a Division of the Department of Public Safety. On or about July 1, 2003, the Division of Motor Vehicles was transferred to the Department of Transportation.

Jack E. Eanes
Chief of Operations
Division of Motor Vehicles
Delaware Department of Transportation
PO Box 698
Dover, DE 19903
(302) 744-2515

Martin Stapleton
Lane Manager (formerly Motor Vehicle Services Supervisor)
Division of Motor Vehicles
Department of Transportation
2230 Hessler Blvd.
New Castle, DE 19720
(302) 434-3290

The defendants reserve the right to supplement this response as discovery proceeds in this matter.

2. A copy of, or description by category and location of, all documents, data compilations, and tangible things that are in the possession, custody, or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment.

RESPONSE:

All non-privileged relevant documents will be made available for inspection and copying by the Plaintiff at a mutually convenient time.

The defendants reserve the right to supplement this response as discovery proceeds in this matter.

3. A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered.

RESPONSE:

None.

The defendants reserve the right to supplement this response as discovery proceeds in this matter.

4. For inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

RESPONSE:

None.

The defendants reserve the right to supplement this response as discovery proceeds in this matter.

DEPARTMENT OF JUSTICESAFETY
STATE OF DELAWARE

/s/ Frederick H. Schranck
FREDERICK H. SCHRANCK (ID No. 925)
Deputy Attorney General
Department of Transportation
800 Bay Road
P.O. Box 778
Dover, DE 19903
(302) 760-2020
Attorney for Defendants State of Delaware
Department of Transportation/DMV

Dated: January 6, 2006

**UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE**

CERTIFICATE OF SERVICE

I hereby certify that on January 6, 2006, I electronically filed Initial Disclosures pursuant to Rule 26 with the Clerk of the Court using CM/ECF, and mailed by US Mail a copy to the Plaintiff at the address below:

Kendall R. Rogers
23 S. Kirkwood Street
Dover, DE 19904

/s/ Frederick H. Schranck
FREDERICK H. SCHRANCK (ID No. 925)
Deputy Attorney General
Department of Transportation
800 Bay Road
P.O. Box 778
Dover, DE 19903
(302) 760-2020
*Attorney for Defendants State of Delaware
Department of Transportation/DMV*

Dated: January 6, 2006